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18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC.,
20 COMMONWEALTH LAND TITLE INSURANCE
21 COMPANY, CHICAGO TITLE INSURANCE COMPANY,
22 FIDELITY NATIONAL TITLE INSURANCE COMPANY,
23 FIDELITY NATIONAL TITLE AGENCY OF NEVADA, INC.,
24 and CHICAGO TITLE OF NEVADA, INC.

25 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
26 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00399-JAD-
**NJKSTIPULATION AND ORDER TO
EXTEND TIME TO RESPOND
COMPLAINT, REMAND MOTION,
AND FEES MOTION (ECF NOS. 1, 9,
AND 10)**

ECF No. 12

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Commonwealth
Land Title Insurance Company ("CLTIC"), Chicago Title Insurance Company ("CTIC"), Fidelity

1 National Title Insurance Company (“FNTIC”), Chicago Title of Nevada, Inc. (“Chicago
2 Agency”), and Fidelity National Title Agency of Nevada, Inc. (“Fidelity Agency”) (collectively,
3 “Defendants”), and plaintiff Bank of America, N.A. (“Bank of America”) (collectively with
4 Defendants, the “Parties”), by and through their respective attorneys of record, which hereby
5 agree and stipulate as follows:

6 1. On March 9, 2021 Bank of America filed its complaint in the Eighth Judicial
7 District Court for the State of Nevada;

8 2. On March 9, 2021, CLTIC, CTIC, and FNTIC removed the instant case to the
9 United States District Court for the State of Nevada (ECF No. 1);

10 3. Chicago Agency’s and Fidelity Agency’s responses to Bank of America’s
11 complaint are currently due on April 14, 2021;

12 4. CLTIC’s and FNTIC’s responses to Bank of America’s complaint are currently
13 due on April 16, 2021;

14 5. Bank of America filed a motion to remand and a motion for fees (ECF Nos. 9 and
15 10);

16 6. Defendants’ deadline to respond to the motion to remand and the motion for fees is
17 currently April 22, 2021;

18 7. The Parties are in the process of negotiating a stipulation to stay this case pending
19 the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-
20 17332 (District Court Case No. 3:19-cv-00241-MMD-WGC);

21 8. Defendants request a two-week extension of these deadlines to both afford the
22 Parties additional time to negotiate their stipulation to stay this case and to afford Defendants
23 additional time to formulate their responses to both the complaint and the pending motions;

24 9. Counsel for Bank of America does not oppose the requested extension;

25 10. This is the first request for an extension made by Defendants, which is made in
26 good faith and not for the purposes of delay.

27 11. This stipulation is entered into without waiving any of Defendants’ objections
28 under Fed. R. Civ. P. 12.

IT IS SO STIPULATED that Chicago Agency's and Fidelity Agency's deadline to respond to the complaint is hereby extended through and including April 28, 2021, CLTIC's and FNTIC's deadline to respond to the complaint is hereby extended through and including April 30, 2021, and Defendants' deadline to respond to the motion to remand and the motion for fees (ECF Nos. 9 and 10) for fees is hereby extended through and including May 6, 2021.

Dated: April 14, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
Attorneys for Defendants
FIDELITY NATIONAL TITLE GROUP,
INC., COMMONWEALTH LAND TITLE
INSURANCE COMPANY, CHICAGO
TITLE INSURANCE COMPANY,
FIDELITY NATIONAL TITLE INSURANCE
COMPANY, FIDELITY NATIONAL TITLE
AGENCY OF NEVADA, INC., and
CHICAGO TITLE OF NEVADA, INC.

Dated: April 14, 2021

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner
DARREN T. BRENNER
Attorneys for Plaintiff
BANK OF AMERICA, N.A.

IT IS SO ORDERED.

Dated this 20th day of April, 2021.


JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE